

Message

From: Bushman, Daniel [Bushman.Daniel@epa.gov]
Sent: 2/13/2020 1:21:27 PM
To: Krasnic, Toni [krasnic.toni@epa.gov]; Turk, David [Turk.David@epa.gov]
CC: Williamson, Tracy [Williamson.Tracy@epa.gov]; Schechter, Kathryn [Schechter.Kathryn@epa.gov]; Wolf, Joel [Wolf.Joel@epa.gov]
Subject: RE: Question Regarding Scope of 721.10536 Definitions

My reading of this text is that it just explains that the structural definitions cover

Ex. 5 Deliberative Process (DP)

Daniel R. Bushman, Ph.D.
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202-566-0743
OCSP/OPPT/TRI Program Division/Regulatory Development Branch
www.epa.gov/tri/chemicals

From: Krasnic, Toni <krasnic.toni@epa.gov>
Sent: Thursday, February 13, 2020 8:10 AM
To: Turk, David <Turk.David@epa.gov>
Cc: Bushman, Daniel <Bushman.Daniel@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>
Subject: RE: Question Regarding Scope of 721.10536 Definitions

Sorry to add another wrinkle to this discussion.

The [2015 final SNUR](#) (page 62445) includes this paragraph on precursors:

The category of LCPFAC chemical substances, based on the chemical structures delineated in 40 CFR 721.10536 (b)(1)(i) through (b)(1)(v) of this final rule, **also includes the salts and precursors** of these perfluorinated carboxylates. LCPFAC precursors may be simple derivatives of perfluorooctanoic acid (PFOA) and higher homologues or certain polymers that may degrade to PFOA or higher homologues. These precursors include all fluorotelomers.

Could CF₃(CF₂)_m-Y be a precursor to (i) though (iv)? If yes, then it should be included even though it doesn't meet the (v) criteria.

Although “precursors” is not mentioned at 40 CFR § 721.10536, EPA has always included “salts and precursors” in the LCPFAC category.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Turk, David <Turk.David@epa.gov>
Sent: Wednesday, February 12, 2020 5:03 PM
To: Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Anderson, Steve <Anderson.Steve@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lloyd, Tyler <Lloyd.Tyler@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Bushman, Daniel <Bushman.Daniel@epa.gov>; Sadowsky, Don <Sadowsky.Don@epa.gov>; Thaler, Elizabeth <thaler.elizabeth@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Subject: RE: Question Regarding Scope of 721.10536 Definitions

After additional discussion with ICB,

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From: Turk, David
Sent: Wednesday, February 12, 2020 1:28 PM
To: Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Anderson, Steve <Anderson.Steve@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lloyd, Tyler <Lloyd.Tyler@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Bushman, Daniel <Bushman.Daniel@epa.gov>; Sadowsky, Don <Sadowsky.Don@epa.gov>; Thaler, Elizabeth <thaler.elizabeth@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>
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We have another question for OGC. This question involves one of the structural formulas provided by 40 CFR 721.10536,

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whether to include such chemicals.

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-Dave, 202-566-1527

From: Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>

Sent: Monday, February 03, 2020 4:27 PM

To: Turk, David <Turk.David@epa.gov>; Anderson, Steve <Anderson.Steve@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lloyd, Tyler <Lloyd.Tyler@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Bushman, Daniel <Bushman.Daniel@epa.gov>; Sadowsky, Don <Sadowsky.Don@epa.gov>; Thaler, Elizabeth <thaler.elizabeth@epa.gov>

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Dave, I've consolidated below the input received from within PTSLO on your question. Once you've had a chance to digest it all, please let us know if you have any additional questions or concerns that you need us to address. Thanks, Chris

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From: Turk, David <Turk.David@epa.gov>
Sent: Thursday, January 30, 2020 1:14 PM
To: Anderson, Steve <Anderson.Steve@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Lloyd, Tyler <Lloyd.Tyler@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Bushman, Daniel <Bushman.Daniel@epa.gov>; Sadowsky, Don <Sadowsky.Don@epa.gov>
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Steve,

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-Dave, 202-566-1527